

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

WILLIAM HILLARD  
Defendant.

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Docket No. 2:22-MJ-49

**MOTION FOR DETENTION**

The United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont, moves for the pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. The defendant is eligible for detention because the case involves the possession of a firearm and destructive devices. See 18 U.S.C. § 3142(f)(1)(E).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of the community. The defendant's offense involves the unlawful possession of a firearm – specifically, an AR-15-style rifle – and multiple destructive devices, including PVC “pipe bombs” containing apparent metal shrapnel. Following his arrest, the defendant admitted that he had detonated approximately 50 explosive devices in recent years. He also admitted that he knew his possession of a firearm was unlawful as a result of his felony convictions. Moreover, witnesses report that that defendant has recently exhibited or engaged in threatening behaviors. He has previously been convicted of two felony offenses, including possession of a bomb or explosives. Additionally, a witness reports that the defendant is a user of both heroin and methamphetamine.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests that the Court conduct the detention hearing upon completion of a bail report by the Pretrial Services Office.

Dated at Burlington, in the District of Vermont, April 14, 2022.

Respectfully submitted,

NIKOLAS P. KEREST  
United States Attorney

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